

**CENTER FOR DRUG EVALUATION AND
RESEARCH**

APPLICATION NUMBER:

205755Orig1s000

PROPRIETARY NAME REVIEW(S)

PROPRIETARY NAME REVIEW

Division of Medication Error Prevention and Analysis (DMEPA)
Office of Medication Error Prevention and Risk Management (OMEPRM)
Office of Surveillance and Epidemiology (OSE)
Center for Drug Evaluation and Research (CDER)

***** This document contains proprietary information that cannot be released to the public*****

Date of This Review:	March 24, 2014
Application Type and Number:	NDA 205755
Product Name and Strength:	Zykadia (Ceritinib) Capules, 150 mg
Product Type:	Single Ingredient
Rx or OTC:	Rx
Applicant/Sponsor Name:	Novartis Pharmaceuticals Corporation
Submission Date:	March 19, 2014
Panorama #:	2014-17103
DMEPA Primary Reviewer:	Otto L. Townsend, PharmD
DMEPA Team Leader:	Chi-Ming (Alice) Tu, PharmD

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1 INTRODUCTION

This review evaluates the proposed proprietary name, Zykadia, from a safety and promotional perspective. The sources and methods used to evaluate the proposed name are outlined in the reference section and Appendix A respectively. The Applicant did not submit an external name study for this proposed proprietary name.

1.1 REGULATORY HISTORY

Novartis submitted the proposed proprietary name, (b) (4) on October 31, 2013 under IND 109272 and subsequently on November 27, 2013 as part of the rolling submission of NDA 205755. However, DMEPA found the name (b) (4) unacceptable due to phonetic similarities to the proprietary name, (b) (4). This finding was communicated to Novartis during a teleconference held on January 27, 2014 (See DARRTS NDA 205755 General advice letter, communication date 1/27/2014).

Subsequently, Novartis submitted the name, (b) (4) for review on February 6, 2014. However, DMEPA found the proposed name, (b) (4) was misinterpreted in FDA prescription simulation study as, (b) (4), and such misinterpretation may be indicative of name confusion in the marketplace. This finding was communicated to Novartis on March 17, 2014 (See DARRTS 205755 General advice letter, communication date 3/18/2014).

Thus, Novartis withdrew the submission for (b) (4) and submitted the alternate proposed name, Zykadia, for review on March 19, 2014.

1.2 PRODUCT INFORMATION

The following product information is provided in the March 19, 2014 proprietary name submission.

- Intended Pronunciation: zye kaye' dee ah
- Active Ingredient: Ceritinib
- Indication of Use: Treatment of patients with (b) (4) metastatic non-small cell lung cancer (NSCLC) who have received prior treatment with an ALK inhibitor.
- Route of Administration: Oral
- Dosage Form: Capsules
- Strength: 150 mg
- Dose and Frequency: 750 mg (5 x 150 mg capsules) once daily
- How Supplied: HDPE bottles for commercial use containing 70 capsules (b) (4)
- Storage: Do not store above 25°C

2 RESULTS

The following sections provide information obtained and considered in the overall evaluation of the proposed proprietary name.

2.1 PROMOTIONAL ASSESSMENT

The Office of Prescription Drug Promotion OPDP determined the proposed name is acceptable from a promotional perspective. DMEPA and the Division of Oncology Products 2 (DOP2) concurred with the findings of OPDP's promotional assessment of the proposed name.

2.2 SAFETY ASSESSMENT

The following aspects were considered in the safety evaluation of the name.

2.2.1 United States Adopted Names (USAN) Search

There is no USAN stem present in the proprietary name¹.

2.2.2 Components of the Proposed Proprietary Name

The Applicant did not provide a derivation or intended meaning for the proposed name, Zykadia in their submission. This proprietary name is comprised of a single word that does not contain any components (i.e. a modifier, route of administration, dosage form, etc.) that are misleading or can contribute to medication error.

2.2.3 FDA Name Simulation Studies

One hundred and seventy (n=170) practitioners participated in DMEPA's prescription studies. The interpretations did not overlap with any currently marketed products or any products in the pipeline, but one practitioner misinterpreted the proposed name as Zyprexa, which looks and sounds similar to the currently marketed product Zyprexa. Additionally, another respondent added a comment that the name could be confused with Zyprexa. Thus, Zyprexa was added to Appendix F for our evaluation. Appendix B contains the results from the verbal and written prescription studies.

¹USAN stem search conducted on February 26, 2014.

2.2.4 Phonetic and Orthographic Computer Analysis (POCA) Search Results

Table 1 lists the number of names with the combined orthographic and phonetic score of $\geq 50\%$ retrieved from our POCA search organized as highly similar, moderately similar or low similarity for further evaluation. Table 1 also includes Zyprexa identified from the FDA Prescription Simulation Study.

Table 1: POCA Search Results

POCA Search Results	Number of Names
Highly similar name pair: combined match percentage score $\geq 70\%$	1
Moderately similar name pair: combined match percentage score $\geq 50\%$ to $\leq 69\%$	44
Low similarity name pair: combined match percentage score $\leq 49\%$	1

2.2.5 Safety Analysis of Names with Potential Orthographic, Spelling, and Phonetic Similarities

Our analysis of the 46 names contained in Table 1 determined none of the names will pose a risk for confusion as described in Appendices C through G.

2.2.6 Communication of DMEPA's Analysis at Midpoint of Review

DMEPA communicated our findings to the Division of Oncology Products 2 (DOP2) via e-mail on March 20, 2014. At that time we also requested additional information or concerns that could inform our review. Per e-mail correspondence from DOP2 on March 21, 2014, they stated no additional concerns with the proposed proprietary name, Zykadia.

3 CONCLUSIONS

The proposed proprietary name is acceptable from both a promotional and safety perspective.

If you have further questions or need clarifications, please contact Kevin Wright, OSE project manager, at 301-796-3621.

3.1 COMMENTS TO THE APPLICANT

We have completed our review of the proposed proprietary name, Zykadia, and have concluded that this name is acceptable.

If any of the proposed product characteristics as stated in your March 19, 2014 submission are altered, the name must be resubmitted for review.

4 REFERENCES

1. *USAN Stems* (<http://www.ama-assn.org/ama/pub/physician-resources/medical-science/united-states-adopted-names-council/naming-guidelines/approved-stems.page>)

USAN Stems List contains all the recognized USAN stems.

2. *Phonetic and Orthographic Computer Analysis (POCA)*

POCA is a system that FDA designed. As part of the name similarity assessment, POCA is used to evaluate proposed names via a phonetic and orthographic algorithm. The proposed proprietary name is converted into its phonemic representation before it runs through the phonetic algorithm. Likewise, an orthographic algorithm exists that operates in a similar fashion. POCA is publicly accessible.

Drugs@FDA

Drugs@FDA is an FDA Web site that contains most of the drug products approved in the United States since 1939. The majority of labels, approval letters, reviews, and other information are available for drug products approved from 1998 to the present.

Drugs@FDA contains official information about FDA-approved *brand name* and *generic drugs*; *therapeutic biological products*, *prescription* and *over-the-counter* human drugs; and *discontinued drugs* (see Drugs @ FDA Glossary of Terms, available at http://www.fda.gov/Drugs/InformationOnDrugs/ucm079436.htm#ther_biological).

RxNorm

RxNorm contains the names of prescription and many OTC drugs available in the United States. RxNorm includes generic and branded:

- Clinical drugs – pharmaceutical products given to (or taken by) a patient with therapeutic or diagnostic intent
- Drug packs – packs that contain multiple drugs, or drugs designed to be administered in a specified sequence

Radiopharmaceuticals, contrast media, food, dietary supplements, and medical devices, such as bandages and crutches, are all out of scope for RxNorm (<http://www.nlm.nih.gov/research/umls/rxnorm/overview.html#>).

Division of Medication Errors Prevention and Analysis proprietary name consultation requests

This is a list of proposed and pending names that is generated by the Division of Medication Error Prevention and Analysis from the Access database/tracking system.

APPENDICES

Appendix A

FDA's Proprietary Name Risk Assessment considers the promotional and safety aspects of a proposed proprietary name.

1. **Promotional Assessment:** For prescription drug products, the promotional review of the proposed name is conducted by OPDP. For over-the-counter (OTC) drug products, the promotional review of the proposed name is conducted by DNCE. OPDP or DNCE evaluates proposed proprietary names to determine if they are overly fanciful, so as to misleadingly imply unique effectiveness or composition, as well as to assess whether they contribute to overstatement of product efficacy, minimization of risk, broadening of product indications, or making of unsubstantiated superiority claims. OPDP or DNCE provides their opinion to DMEPA for consideration in the overall acceptability of the proposed proprietary name.
2. **Safety Assessment:** The safety assessment is conducted by DMEPA, and includes the following:
 - a. Preliminary Assessment: We consider inclusion of USAN stems or other characteristics that when incorporated into a proprietary name may cause or contribute to medication errors (i.e., dosing interval, dosage form/route of administration, medical or product name abbreviations, names that include or suggest the composition of the drug product, etc.) See prescreening checklist below in Table 2*. DMEPA defines a medication error as any preventable event that may cause or lead to inappropriate medication use or patient harm while the medication is in the control of the health care professional, patient, or consumer.²

***Table 2- Prescreening Checklist for Proposed Proprietary Name**

	Affirmative answers to these questions indicate a potential area of concern.
Y/N	Does the name have obvious Similarities in Spelling and Pronunciation to other Names?
Y/N	Are there Manufacturing Characteristics in the Proprietary Name?
Y/N	Are there Medical and/or Coined Abbreviations in the Proprietary Name?
Y/N	Are there Inert or Inactive Ingredients referenced in the Proprietary Name?
Y/N	Does the Proprietary Name include combinations of Active Ingredients
Y/N	Is there a United States Adopted Name (USAN) Stem in the Proprietary Name?
Y/N	Is this the same Proprietary Name for Products containing Different Active Ingredients?
Y/N	Is this a Proprietary Name of a discontinued product?

² National Coordinating Council for Medication Error Reporting and Prevention.
<http://www.nccmerp.org/aboutMedErrors.html>. Last accessed 10/11/2007.

- b. Phonetic and Orthographic Computer Analysis (POCA): Following the preliminary screening of the proposed proprietary name, DMEPA staff evaluates the proposed name against potentially similar names. In order to identify names with potential similarity to the proposed proprietary name, DMEPA enters the proposed proprietary name in POCA and queries the name against the following drug reference databases, Drugs@fda, CernerRxNorm, and names in the review pipeline using a 50% threshold in POCA. DMEPA reviews the combined orthographic and phonetic matches and group the names into one of the following three categories:
- Highly similar pair: combined match percentage score $\geq 70\%$.
 - Moderately similar pair: combined match percentage score $\geq 50\%$ to $\leq 69\%$.
 - Low similarity: combined match percentage score $\leq 49\%$.

Using the criteria outlined in the check list (Table 3-5) that corresponds to each of the three categories (highly similar pair, moderately similar pair, and low similarity), DMEPA evaluates the name pairs to determine the acceptability or non-acceptability of a proposed proprietary name. Based on our root cause analysis of post marketing experience errors, we find the expression of strength and dose, which is often located in close proximity to the drug name itself on prescriptions and medication orders, is an important factor in mitigating or potentiating confusion between similarly named drug pairs. The ability of other product characteristics to mitigate confusion is limited (e.g., route, frequency, dosage form, etc.).

- For highly similar names, there is little that can mitigate a medication error, including product differences such as strength and dose. Thus, proposed proprietary names that have a combined score of ≥ 70 percent are likely to be rejected by FDA. (See Table 3)
- Moderately similar names with overlapping or similar strengths or doses represent an area for concern for FDA. The dosage and strength information is often located in close proximity to the drug name itself on prescriptions and medication orders, can be an important factor that either increases or decreases the potential for confusion between similarly named drug pairs. The ability of other product characteristics (e.g., route, frequency, dosage form, etc.) to mitigate confusion may be limited when the strength or dose overlaps. FDA will review these names further, to determine whether sufficient differences exist to prevent confusion. (See Table 4)
- Names with low similarity that have no overlap or similarity in strength and dose are generally acceptable unless there are data to suggest that the name might be vulnerable to confusion (e.g., prescription simulation study suggests that the name is likely to be misinterpreted as a marketed product). In these instances, we would reassign a low similarity name to the moderate similarity category and review according to the moderately similar name pair checklist (See Table 5).

- c. FDA Prescription Simulation Studies: DMEPA staff also conducts a prescription simulation studies using FDA health care professionals.

Three separate studies are conducted within the Centers of the FDA for the proposed proprietary name to determine the degree of confusion of the proposed proprietary name with marketed U.S. drug names (proprietary and established) due to similarity in visual appearance with handwritten prescriptions or verbal pronunciation of the drug name. The studies employ healthcare professionals (pharmacists, physicians, and nurses), and attempts to simulate the prescription ordering process. The primary Safety Evaluator uses the results to identify orthographic or phonetic vulnerability of the proposed name to be misinterpreted by healthcare practitioners.

In order to evaluate the potential for misinterpretation of the proposed proprietary name in handwriting and verbal communication of the name, inpatient medication orders and/or outpatient prescriptions are written, each consisting of a combination of marketed and unapproved drug products, including the proposed name. These orders are optically scanned and one prescription is delivered to a random sample of participating health professionals via e-mail. In addition, a verbal prescription is recorded on voice mail. The voice mail messages are then sent to a random sample of the participating health professionals for their interpretations and review. After receiving either the written or verbal prescription orders, the participants record their interpretations of the orders which are recorded electronically.

- d. Comments from Other Review Disciplines: DMEPA requests the Office of New Drugs (OND) and/or Office of Generic Drugs (OGD), ONDQA or OBP for their comments or concerns with the proposed proprietary name, ask for any clinical issues that may impact the DMEPA review during the initial phase of the name review. Additionally, when applicable, at the same time DMEPA requests concurrence/non-concurrence with OPDP's decision on the name. The primary Safety Evaluator addresses any comments or concerns in the safety evaluator's assessment.

The OND/OGD Regulatory Division is contacted a second time following our analysis of the proposed proprietary name. At this point, DMEPA conveys their decision to accept or reject the name. The OND or OGD Regulatory Division is requested to provide any further information that might inform DMEPA's final decision on the proposed name.

Additionally, other review disciplines opinions such as ONDQA or OBP may be considered depending on the proposed proprietary name.

When provided, DMEPA considers external proprietary name studies conducted by or for the Applicant/Sponsor and incorporates the findings of these studies into the overall risk assessment.

The DMEPA primary reviewer assigned to evaluate the proposed proprietary name is responsible for considering the collective findings, and provides an overall risk assessment of the proposed proprietary name.

Table 3. Highly Similar Name Pair Checklist (i.e., combined Orthographic and Phonetic score is $\geq 70\%$).

Answer the questions in the checklist below. Affirmative answers to these questions suggest that the pattern of orthographic or phonetic differences in the names may render the names less likely to confusion, provided that the pair do not share a common strength or dose (see Step 1 of the Moderately Similar Checklist).

<u>Orthographic Checklist</u>		<u>Phonetic Checklist</u>	
Y/N	Do the names begin with different first letters? <i>Note that even when names begin with different first letters, certain letters may be confused with each other when scripted.</i>	Y/N	Do the names have different number of syllables?
Y/N	Are the lengths of the names dissimilar* when scripted? <i>*FDA considers the length of names different if the names differ by two or more letters.</i>	Y/N	Do the names have different syllabic stresses?
Y/N	Considering variations in scripting of some letters (such as <i>z</i> and <i>f</i>), is there a different number or placement of upstroke/downstroke letters present in the names?	Y/N	Do the syllables have different phonologic processes, such as vowel reduction, assimilation, or deletion?
Y/N	Is there different number or placement of cross-stroke or dotted letters present in the names?	Y/N	Across a range of dialects, are the names consistently pronounced differently?
Y/N	Do the infixes of the name appear dissimilar when scripted?		
Y/N	Do the suffixes of the names appear dissimilar when scripted?		

Table 4: Moderately Similar Name Pair Checklist (i.e., combined score is $\geq 50\%$ to $\leq 69\%$).

<p>Step 1</p>	<p>Review the DOSAGE AND ADMINISTRATION and HOW SUPPLIED/STORAGE AND HANDLING sections of the prescribing information (or for OTC drugs refer to the Drug Facts label) to determine if strengths and doses of the name pair overlap or are very similar. Different strengths and doses for products whose names are moderately similar may decrease the risk of confusion between the moderately similar name pairs. Name pairs that have overlapping or similar strengths have a higher potential for confusion and should be evaluated further (see Step 2).</p> <p>For single strength products, also consider circumstances where the strength may not be expressed.</p> <p>For any combination drug products, consider whether the strength or dose may be expressed using only one of the components.</p> <p>To determine whether the strengths or doses are similar to your proposed product, consider the following list of factors that may increase confusion:</p> <ul style="list-style-type: none"> ○ Alternative expressions of dose: 5 mL may be listed in the prescribing information, but the dose may be expressed in metric weight (e.g., 500 mg) or in non-metric units (e.g., 1 tsp, 1 tablet/capsule). Similarly, a strength or dose of 1000 mg may be expressed, in practice, as 1 g, or vice versa. ○ Trailing or deleting zeros: 10 mg is similar in appearance to 100 mg which may potentiate confusion between a name pair with moderate similarity. ○ Similar sounding doses: 15 mg is similar in sound to 50 mg
<p>Step 2</p>	<p>Answer the questions in the checklist below. Affirmative answers to these questions suggest that the pattern of orthographic or phonetic differences in the names may render the names less likely to confusion between moderately similar names with overlapping or similar strengths or doses.</p>

<p>Orthographic Checklist (Y/N to each question)</p> <ul style="list-style-type: none"> • Do the names begin with different first letters? <p>Note that even when names begin with different first letters, certain letters may be confused with each other when scripted.</p> <ul style="list-style-type: none"> • Are the lengths of the names dissimilar* when scripted? <p>*FDA considers the length of names different if the names differ by two or more letters.</p> <ul style="list-style-type: none"> • Considering variations in scripting of some letters (such as <i>z</i> and <i>f</i>), is there a different number or placement of upstroke/downstroke letters present in the names? • Is there different number or placement of cross-stroke or dotted letters present in the names? • Do the infixes of the name appear dissimilar when scripted? • Do the suffixes of the names appear dissimilar when scripted? 	<p>Phonetic Checklist (Y/N to each question)</p> <ul style="list-style-type: none"> • Do the names have different number of syllables? • Do the names have different syllabic stresses? • Do the syllables have different phonologic processes, such as vowel reduction, assimilation, or deletion? • Across a range of dialects, are the names consistently pronounced differently?
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Table 5: Low Similarity Name Pair Checklist (i.e., combined score is $\leq 49\%$).

In most circumstances, these names are viewed as sufficiently different to minimize confusion. Exceptions to this would occur in circumstances where there are data that suggest a name with low similarity might be vulnerable to confusion with your proposed name (for example, misinterpretation of the proposed name as a marketed product in a prescription simulation study). In such instances, FDA would reassign a low similarity name to the moderate similarity category and review according to the moderately similar name pair checklist.

Appendix B: Prescription Simulation Samples and Results

Figure 1. Zykadia Study (Conducted on February 21, 2014)

Handwritten Requisition Medication Order	Verbal Prescription
<p><u>Medication Order:</u></p> <p><i>Zykadia 750mg po once daily</i></p>	<p>“Zykadia 150 mg 5 capsules orally once daily. Dispense 150 capsules.”</p>
<p><u>Outpatient Prescription:</u></p> <p><i>Zykadia 150mg 5 caps po qday #150</i></p>	

FDA Prescription Simulation Responses (Aggregate 1 Rx Studies Report)

276 People Received Study

170 People Responded

Study Name: Zykadia

	57	53	60	
INTERPRETATION	OUTPATIENT	VOICE	INPATIENT	TOTAL
ANTI-PYSCHOTIC MED	0	0	1	1
CARCADIA	0	1	0	1
CEKADIA	0	1	0	1
CICADIA	0	1	0	1
CIRCADIA	0	2	0	2
ORTSACADIA	0	1	0	1
SECADIA	0	1	0	1
SEKEDIA	0	1	0	1
XACADIA	0	2	0	2
ZACADIA	0	15	0	15
ZACHADIA	0	1	0	1
ZAKADIA	0	4	0	4
ZARCADIA	0	1	0	1
ZECADIA	0	6	0	6
ZEKADIA	0	2	0	2
ZICADDIA	0	1	0	1
(b) (4)	0	8	0	8
(b) (4) 150 MG	0	1	0	1
ZYBADEA	0	0	1	1
ZYBADIA	1	0	1	2
ZYBANDIA	1	0	0	1
ZYBRADEA	0	0	1	1
ZYBRADIA	0	0	1	1
ZYCADIA	1	4	0	5
ZYFRADIA	0	0	3	3
ZYHADEA	0	0	3	3
ZYHADIA	0	0	11	11
ZYHADIO	0	0	3	3

ZYHADRA	0	0	5	5
ZYHADREA	0	0	1	1
ZYHADRO	0	0	2	2
ZYKADEA	5	0	2	7
ZYKADIA	42	0	4	46
ZYKADIA 150 MG	1	0	0	1
ZYKDIA	1	0	0	1
ZYPADEA	0	0	2	2
ZYPRADIA	0	0	6	6
ZYPRDEA	0	0	1	1
ZYPREXIA	1	0	0	1
ZYRADEA	0	0	2	2
ZYRADIA	4	0	3	7
ZYRADIO	0	0	2	2
ZYTRADIA	0	0	3	3
ZYTRADRA	0	0	1	1

Appendix C: Highly Similar Names (i.e., combined POCA score is $\geq 70\%$)

No.	Proposed name: Zykadia Strength(s): 150 mg Usual Dose: 750 mg (5 capsules) by mouth once daily.	POCA Score	Orthographic and/or phonetic differences in the names sufficient to prevent confusion
1.	(b) (4) ***	88	(b) (4)

*** Proprietary information that cannot be released to the public.

Appendix D: Moderately Similar Names (i.e., combined POCA score is $\geq 50\%$ to $\leq 69\%$) with no overlap in Strength and/or Dose

No.	Proposed Name	POCA Score
1.	(b) (4) ***	62
2.	KADIAN	60
3.	Zyclara	60
4.	Terpadina	58
5.	Tripedia	56
6.	AVANDIA	54
7.	IGNATIA	54
8.	Vitadye	54
9.	ZETONNA	54
10.	ZIANA	54
11.	(b) (4) *** (IND (b) (4) – active application)	54
12.	TYSABRI	52
13.	(b) (4) *** (IND (b) (4) – active application)	52
14.	ZEBETA	52
15.	Zydaclin	51
16.	ACANYA	50
17.	Dytan-AT	50
18.	KADCYLA	50
19.	Palladia	50
20.	VITAMIN A	50
21.	Zenzedi	50
22.	Zytopic	50

Appendix E: Moderately Similar Names (i.e., combined POCA score is $\geq 50\%$ to $\leq 69\%$) with overlap in Strength and/or Dose

No.	Proposed name: Zykadia Strength(s): 150 mg Usual Dose: 750 mg (5 capsules) by mouth once daily.	POCA Score	Prevention of Failure Mode In the conditions outlined below, the following combination of factors, are expected to minimize the risk of confusion between these two names								
1.	ZYTIGA	64	<p>The names differ phonetically. Zykadia has four syllables while Zytiga has three syllables.</p> <table border="1" data-bbox="792 716 1247 835"> <tr> <td>zye</td> <td>kaye'</td> <td>dee</td> <td>ah</td> </tr> <tr> <td>zye</td> <td>tee</td> <td>ga</td> <td></td> </tr> </table> <p>The suffixes of this name pair have sufficient orthographic differences.</p>	zye	kaye'	dee	ah	zye	tee	ga	
zye	kaye'	dee	ah								
zye	tee	ga									
2.	(b) (4) ***	59	(b) (4)								
3.	NATAZIA	58	<p>The names differ phonetically by the first two syllables of the name pair.</p> <table border="1" data-bbox="792 1146 1247 1266"> <tr> <td>zye</td> <td>kaye'</td> <td>dee</td> <td>ah</td> </tr> <tr> <td>Nah</td> <td>'tah</td> <td>zee</td> <td>ah</td> </tr> </table> <p>The prefixes of this name pair have sufficient orthographic differences.</p>	zye	kaye'	dee	ah	Nah	'tah	zee	ah
zye	kaye'	dee	ah								
Nah	'tah	zee	ah								
4.	ZETIA	58	<p>The names differ phonetically. Zykadia has four syllables while Zetia has three syllables.</p> <table border="1" data-bbox="792 1444 1247 1564"> <tr> <td>zye</td> <td>kaye'</td> <td>dee</td> <td>ah</td> </tr> <tr> <td>'zet</td> <td>ee</td> <td>ah</td> <td></td> </tr> </table> <p>The lengths of the names are dissimilar when scripted.</p> <p>The prefixes of this name pair have sufficient orthographic differences.</p>	zye	kaye'	dee	ah	'zet	ee	ah	
zye	kaye'	dee	ah								
'zet	ee	ah									

*** Proprietary information that cannot be released to the public.

No.	Proposed name: Zykadia Strength(s): 150 mg Usual Dose: 750 mg (5 capsules) by mouth once daily.	POCA Score	Prevention of Failure Mode In the conditions outlined below, the following combination of factors, are expected to minimize the risk of confusion between these two names
5.	(b) (4) ***	58	(b) (4)
6.	(b) (4) ***	56	(b) (4)
7.	(b) (4) ***	55	(b) (4)
8.	(b) (4) ***	54	(b) (4)
9.	(b) (4) ***	53	(b) (4)
10.	(b) (4) ***	53	(b) (4)
11.	SymTan A	52	Name identified from POCA RxNorm. Product discontinued and there are no marketed alternatives.
12.	(b) (4) ***	51	(b) (4)

*** Proprietary information that cannot be released to the public.

No.	Proposed name: Zykadia Strength(s): 150 mg Usual Dose: 750 mg (5 capsules) by mouth once daily.	POCA Score	Prevention of Failure Mode In the conditions outlined below, the following combination of factors, are expected to minimize the risk of confusion between these two names								
13.	(b) (4) ***	51	(b) (4)								
14.	(b) (4) ***	50	(b) (4)								
15.	(b) (4) ***	50	(b) (4)								
16.	LYSTEDA	50	<p>The names differ phonetically. Zykadia has four syllables while Lysteda has three syllables.</p> <table border="1" data-bbox="789 953 1247 1075"> <tr> <td>zye</td> <td>kaye'</td> <td>dee</td> <td>ah</td> </tr> <tr> <td>lye</td> <td>sted</td> <td>a</td> <td></td> </tr> </table> <p>The infixes of this name pair have sufficient orthographic differences.</p>	zye	kaye'	dee	ah	lye	sted	a	
zye	kaye'	dee	ah								
lye	sted	a									
17.	(b) (4) ***	50	(b) (4)								
18.	(b) (4) ***	50	(b) (4)								

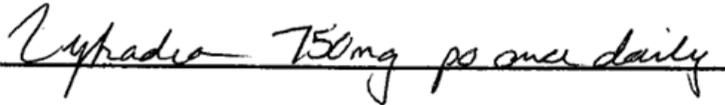
*** Proprietary information that cannot be released to the public.

No.	Proposed name: Zykadia Strength(s): 150 mg Usual Dose: 750 mg (5 capsules) by mouth once daily.	POCA Score	Prevention of Failure Mode In the conditions outlined below, the following combination of factors, are expected to minimize the risk of confusion between these two names								
19.	Visqid AA	50	<p>The names differ phonetically. None of the syllables sound similar to its counterpart.</p> <table border="1" data-bbox="789 590 1247 709"> <tr> <td>zye</td> <td>kaye'</td> <td>dee</td> <td>ah</td> </tr> <tr> <td>'vis</td> <td>Kid</td> <td>'ā</td> <td>'ā</td> </tr> </table> <p>When scripted, the names including prefixes, infixes and suffixes have sufficient orthographic differences.</p>	zye	kaye'	dee	ah	'vis	Kid	'ā	'ā
zye	kaye'	dee	ah								
'vis	Kid	'ā	'ā								
20.	XTANDI	50	<p>The names differ phonetically. Zykadia has four syllables while Xtandi has three syllables. Additionally, the first two syllables are dissimilar.</p> <table border="1" data-bbox="789 1031 1247 1150"> <tr> <td>zye</td> <td>kaye'</td> <td>dee</td> <td>ah</td> </tr> <tr> <td>ex</td> <td>TAN</td> <td>dee</td> <td></td> </tr> </table> <p>The prefixes of this name pair have sufficient orthographic differences.</p>	zye	kaye'	dee	ah	ex	TAN	dee	
zye	kaye'	dee	ah								
ex	TAN	dee									
21.	(b) (4) ***	50	<div style="background-color: #cccccc; width: 100%; height: 40px; display: flex; justify-content: space-between; align-items: center;"> (b) (4) </div>								

*** Proprietary information that cannot be released to the public.

No.	Proposed name: Zykadia Strength(s): 150 mg Usual Dose: 750 mg (5 capsules) by mouth once daily.	POCA Score	Prevention of Failure Mode In the conditions outlined below, the following combination of factors, are expected to minimize the risk of confusion between these two names								
22.	Zovia 1/50	50	<p>The names differ phonetically. Zykadia has four syllables while Zovia only has three syllables.</p> <table border="1" data-bbox="789 590 1247 709"> <tr> <td>zye</td> <td>kaye'</td> <td>dee</td> <td>ah</td> </tr> <tr> <td>zo</td> <td>'vee</td> <td>ah</td> <td></td> </tr> </table> <p>The infixes of this name pair have sufficient orthographic differences</p> <p>Additionally, Zovia is available as Zovia 1/50 and Zovia 1/35. The strength would need to be indicated on a prescription or medication order.</p>	zye	kaye'	dee	ah	zo	'vee	ah	
zye	kaye'	dee	ah								
zo	'vee	ah									

Appendix F: Low Similarity Names (i.e., combined POCA score is $\leq 49\%$)

No.	Name	POCA Score	<p>Prevention of Failure Mode</p> <p>In the conditions outlined below, the following combination of factors, are expected to minimize the risk of confusion between these two names</p>
1.	Zyprexa	47	<p>Name was identified from FDA Simulation Prescription Study. One practitioner misinterpreted the proposed name as Zyprexia, which looks and sounds similar to the currently marketed product Zyprexa. Additionally, one respondent interpreted name as, Zypradia (see sample below), but commented, “Could be confused with Zyprexa.”</p> <p>The suffixes of this name pair have sufficient orthographic differences.</p> <p><u>RX study sample:</u></p>  <p><u>Writing Sample of Name Pair:</u></p>  <p>Further, Zykadia is a single strength oral capsule (150 mg) compared to Zyprexa which is available in multiple strengths and dosage forms (immediate release tablets, orally disintegrating tablets, and intramuscular injection) which would need to be included in a medication order or prescription.</p>

Appendix G: Names with unidentified product characteristics

No.	Name	POCA Score
1.	Vitadil 2A	60
2.	Vitadil 5A	60
3.	(b) (4) *** Name identified from POCA Name Entered by Safety Evaluator. However, a search of AIMS/PNL and DMEPA repository did not identify this name.	57
4.	Zida-Co	50

*** Proprietary information that cannot be released to the public.

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

OTTO L TOWNSEND
03/24/2014

CHI-MING TU
03/24/2014